

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MASSACHUSETTS INSTITUTE OF
TECHNOLOGY,

Plaintiff,

v.

HARMAN INTERNATIONAL
INDUSTRIES, INCORPORATED,

A Delaware Corporation,

Defendant.

Case No. 05-10990 DPW
Magistrate Judge Judith G. Dein

**HARMAN'S ASSENTED-TO MOTION TO SEAL EXHIBITS A, C, AND E
IN SUPPORT OF ITS REPLY IN SUPPORT OF ITS MOTION TO COMPEL**

Pursuant to Local Rule 7.2, Defendant Harman International Industries, Inc. ("Harman") hereby respectfully moves for an order to provide for Harman's submission of confidential materials under seal in support of its Reply in Support of Its Motion to Compel Discovery, filed on July 21, 2006 (Docket Number 95).

In support of this Motion, Harman states the following:

1. Pursuant to paragraph 7 of the parties' Protective Order in this case, which was entered by the Court on January 31, 2006 (Docket Entry 42), any documents designating, disclosing or referencing any Confidential Information or Highly Confidential Information shall be filed under seal in accordance with the Court's Local Rules.

2. Harman seeks to file under seal the following documents which were produced by MIT and designated as "Highly Confidential" in support of its Reply in Support of Its Motion to Compel Discovery (Docket Number 95): (1) MIT 06862-MIT 06864.001 as Exhibit A; (2) MIT 06878-06879 as Exhibit C; and (3) MIT 06845-06846 as Exhibit E.

WHEREFORE, Harman respectfully requests that the Court enter an Order permitting Harman to file under seal Exhibits A, C, and E in support of Harman's Reply in Support of its Motion to Compel Discovery, filed on July 21, 2006.

Certificate of Compliance with Local Rule 7.1

Harman, by and through its attorneys, hereby certifies that it conferred with MIT's counsel on July 21, 2006, and counsel for MIT has assented to this motion.

Dated: July 24, 2006

Respectfully submitted,

/s/ Courtney A. Clark
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing HARMAN'S ASSENTED-TO MOTION TO SEAL EXHIBITS A, C, AND E IN SUPPORT OF ITS REPLY IN SUPPORT OF ITS MOTION TO COMPEL (filed on July 21, 2006) was sent by electronic-mail this 24th day of July, 2006, addressed to counsel for MIT as follows:

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Email: sbauer@proskauer.com

Counsel for Plaintiff MIT

/s/ Courtney A. Clark

One of the Attorneys for Harman